UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	NO. 3:22-cr-00282
)	JUDGE RICHARDSON
)	
GLEN CASADA and)	
CADE COTHREN,)	
)	
Defendants.)	

DEFENDANTS' JOINT MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Defendants jointly, through counsel, move this Honorable Court for an ORDER allowing them to file the attached document under Seal. In support, counsel would show that Administrative Order No. 167-1 at Section 5.07 requires parties to file a motion seeking leave of court prior to the filing of any sealed documents.

In the present matter, Defendants submit that their Reply cites to this Court's Sealed Order (Doc No. 251), and so Defendants' Reply citing to the Sealed Order tracks the sealed nature of the underlying Order.

The Defendants will file as an exhibit to this Motion a redacted version of its Reply, but an unredacted version will be submitted to the Court and served on Government, as these recipients have seen Sealed Order (Doc. No. 251) already. Redactions are authorized pursuant to the Court's Order (Doc No. 23) and redactions are needed to keep Defendants' trial strategy confidential.

Respectfully submitted,

/s/ Jonathan P. Farmer

Edward M. Yarbrough (BPR #004097)
Jonathan P. Farmer (BPR #020749)
Chase Fann (BPR #036794)
511 Union St, Suite 1000
Nashville, TN 37219
(P) 615-238-6300
eyarbrough@spencerfane.com
jfarmer@spencerfane.com
cfann@spencerfane.com

Counsel for Defendant Glen Casada

Sherwood Boutique Litigation, PLC

/s/ Cynthia A. Sherwood
Cynthia A. Sherwood, #20911
Austin M. Correll, #39561
414 Union Street
Suite 1110
Nashville, TN 37219
T: 615-873-5670
F: 615-900-2312
cynthia@sherwoodlitigation.com
austin@sherwoodlitigation.com
Counsel for Defendant Cade Cothren

Barnes & Thornburg LLP

/s/ Joy Boyd Longnecker
Joy Boyd Longnecker, #29627
1600 West End Avenue
Suite 800
Nashville, TN 37203
T: 615-621-6012
joy.longnecker@btlaw.com
Counsel for Defendant Cade Cothren

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2025, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a Notice of Electronic Filing to the following:

Taylor J. Phillips
Assistant US Attorney
U.S. Attorney's Office - Middle District
719 Church St. Suite 3300
Nashville, TN 37203
taylor.phillips@usdoj.gov

John P. Taddei
Blake J. Ellison
Trial Attorneys
Public Integrity Section, Criminal Division
U.S. Department of Justice
1301 New York Ave., NW
Washington, DC 20530
john.taddei@usdoj.gov
blake.ellison@usdoj.gov

/s/ Jonathan P. Farmer
Jonathan P. Farmer